

UNITED STATES DISTRICT COURT
FOR THE SOUTHWESTERN DISTRICT OF OHIO

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U.S. DISTRICT COURT
SOUTHWESTERN DISTRICT OF OHIO
WEST DIV. CINCINNATI

1:11 CV 881

Daniel R Haller

Plaintiff

-vs.-

**(A1) US Dept of Housing
& Urban Development HUD/FHA**
Deputy Inspector General Michael P. Stephens

and

(A2) MERSCORP, INC.
President and CEO Bill Beckmann

and

(A3) First Horizon Home Loans
aka: First Horizon National Corporation
aka: First Tennessee National Corp
President and CEO D. Bryan Jordan

and

(A4) Federal National Mortgage Association
Fannie Mae President & CEO Michael J. Williams

and

(A5) JP Morgan Chase & Co
President James S. Crown and CEO Jamie Dimon

and

(A6) IBM/LBPS - SERTERUS
President and CEO Afzal Assur
Acting President and Director Jay Memmott
Vice President Karen B Pollock

and

(A6) Lerner Sampson and Rothfuss
President and CEO Richard M Rothfuss

Case No: 1:11 - CV -

**Judge: J. BARRETT
M.J. LITKOVITZ**
IMMEDIATE INJUNCTION
WITH MEMORANDUM

CIVIL AND CRIMINAL COMPLAINT
WITH INTENT AND

JURY DEMAND

and)
)
(47) **The Office of the Comptroller of Currency**)
Chief Executive John G. Walsh)
)
and)
)
(47) **Office of Thrift Supervision**)
Director John E. Bowman)
)
and)
)
(47) **Board of Governors of the Federal Reserve**)
Chairman Ben S. Bernanke)
)
and)
)
(47) **Federal Deposit Insurance Corporation**)
or FDIC Director Thomas J Curry)
)
and)
)
(47) **Consumer Financial Protection Bureau**)
Director Richard Cordray)
)
and)
)
(47) **National Credit Union Administration**)
Inspector General William DeSarno)
)
and)
)
(B1) **OHFA Ohio Housing Finance Agency**)
Save The Dream Oh Initiative – Restoring Stability)
Executive Director Douglas A. Garver)
)
and)
)
(B2) **STATE OF OHIO**)
Attorney General Mike DeWine)
)
and)
)
(B3) **SEC Security and Exchange Commission**)
Chairman Mary L. Schapiro)
)
and)
)
(C1) **Commodity Futures Trading Commission**)
Chairman Gary Gensler)

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and)
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)
(C2) US Dept of the Treasury)
Secretary of the Treasury Timothy Geithner) :
)
and)
)
(C3) United States)
Attorney General Eric Holder) :
)
and)
)
(D1) Securities Investor Protection Corp)
President and CEO Stephen P. Harbeck)
)
and)
)
(D2) North American)
Securities Administration Association)
President Jack Herstein and Director Steven Irwin)
)
and)
)
(F1) Unknown Defendants)
Other Banks, Stock Markets, & Other Unknowns)
)
Defendants)
)
)
_____)

MOTION FOR JUDICIAL PANEL

I. INTRODUCTION – PRIMARY ACTION

1. This action is primarily the direct result of a breach born and caused by a mortgage service provider and an illegal foreclosure action brought by a law firm. Not to exclude a time of unemployment subsequent to the breach, but upon re-employment a refusal from several agencies to assist with federal funding in accord to 12 USC § 2701¹ followed by two additional mortgage service

¹ Emergency Homeowners Relief Act (EHLRA) of the Emergency Housing Act of 1975, as amended 12 USC § 2701

providers (and alleging regulatory committees included in) purposely refusing to adjust and modify mortgage loan(s) to an affordable amount – in order to profit from foreclosure.

2. Pursuant to 28 USC § 46 *assignment of judge panels* 28 USC § 1407(c)(ii) *multidistrict litigation*, 15 USC § 26 *injunctive relief* and 28 USC §§ 2283 *stay of state court proceedings* and FRCP24 *intervention*, FRCP 38(a)(b) *right to trial by jury*, FRCP65 *injunctions* Plaintiff hereby respectfully moves the US District Court of Southwestern Ohio to impose Immediate Injunctive Relief as defined in Section III, to review the complaint by Judicial Panel and set the case for Jury Trial, in order to fairly restore stability, recover damages properly in regard to securities fraud, breaches of contracts, including federal HUD/FHA obligations and service agreements, and to decide the constitutionality of laws and regulations regarding securities fraud in the housing market, and criminal conduct, and to halt further fraud.

3. The common relationship of this action to other foreclosure actions of type, is the common denominator of illegal securitized mortgages, which can easily be determined by the “unclean” transfers that have or include “MERS” on the transfer (last page, Exhibit A).² *ON FILE A1009020* Private contracts have fraudulently come into public trading, making the contracts or notes without legal effect, and placing a direct and undue burden upon many people, many of which are now homeless, and the courts. This class of victims, have NOT been heard or made whole. Actions without this common denominator (*illegal securitized mortgages*) do not fall under this type of foreclosure, and therefore do not qualify for class status.

II. INTRODUCTION – SECONDARY, JUDICIAL DISCRETION

4. Secondary to the primary action, are questions of national importance, with great consideration for federal laws, laws of regulation, criminal actions, and settlements that have been performed by the

² MERSCORP, INC on record as “Mortgage Electronic Registration Systems Inc” as Conveyor OR Conveyee

States as well as by the SEC that have been disputed and settled *ex-parte*. Consideration for nation-wide injunctions, and consolidation of complaints according to FRCP23 *class action* regarding foreclosures across the nation under this class category, is strictly at the discretion of the Court and is an additional consideration of the court, that is not to be confused with the primary cause of action in this matter.

5. Profit has been made on the Stock Market, by the Investors, by the Law Firms, by the States, and by several private and federal Agencies and Banks at the cost of the taxpayer.

6. The fraud continues today and the United States of America is nearly held hostage by the banks.

7. The Court shall consider Jurisdiction under 28 USC §1337 *commerce and antitrust regulations under Acts of Congress*, 28 USC §1491 *claims against US generally*, 28 USC §2674 *liability of the US*.

This would not fall under an action of any “expressed or implied contract of employee” (i.e. military) or of a matter over “internal revenue tax.” Evidence by trial will reveal more defendants, and it is Plaintiff’s assumption that since Congress depends on Advisors (as is the case here with the Treasury department under Alan Greenspan), that the United States may be removed. The United States however, must be named party to the complaint even if removed.

8. Plaintiff reserves the right to add Defendants and further LAW as evidence is revealed.

9. It is fundamental that a court must have “personal jurisdiction” over a defendant (or plaintiff) before it can enter a valid judgment imposing any action upon the parties. The Hamilton County Common Pleas Court has intentionally and illegally made decree against this Plaintiff in a diversity matter (Exhibit A), whereby the Plaintiff here now moves this Court to Intervene by Injunction and conduct trials properly within the correct Jurisdiction. The matter before this court will cover a wide-range of laws including several laws and authorities under Titles 7 Commodity Exchanges, 12 Banks and Banking, 15 Commerce and Trade, 18 Crimes and Criminal Procedure, and 28 Judiciary and Judicial Procedure.

III. JURISDICTION AND IMMEDIATE INJUNCTIVE RELIEF

10. Because Hamilton County Court of Common Pleas is attempting to grant summary judgment without proper Jurisdiction on a 1.) multijurisdictional matter where that court does not have Jurisdiction, to 2.) illegally foreclose on property without proper trial, where there is evidence that the plaintiff in matter A1009020 3.) has NO standing and 4.) has no subject matter to invoke the jurisdiction of the court,

11. Plaintiff moves The Southwestern District Court of Ohio, having Original or Exclusive Jurisdiction respectively, to provide Immediate Injunctive Relief as defined in this section regarding matters of but not limiting to the following US codes:

- a.) 18 USC § 241 *conspiracy against civil rights,*
- b.) 18 USC § 242 *deprivation of rights under color of law,*
- c.) 18 USC § 1346 *def: scheme or artifice to defraud,*
- d.) 18 USC § 1348 *securities and commodities fraud,*
- e.) 18 USC § 1965 *district court has jurisdiction under title 18,*
- f.) 18 USC § 1962 *unlawful to receive income from racketeering activity,*
- g.) 18 USC § 1964 *district courts shall have jurisdiction to prevent and restrain for violations of § 1962,*
- h.) 28 USC § 1330 *diversity for actions of any amount,*
- i.) 28 USC § 1331 *questions regarding federal law,*
- j.) 28 USC § 1332 *diversity for amounts over 75,000,*
- k.) (under 28 USC § 1334 banking) where 11 USC § 111 *credit counseling agencies* applies within this complaint,

- l.) 28 USC § 1337 *commerce and antitrust regulations*,
- m.) 28 USC § 1343 *bankruptcy cases and proceedings* (Does NOT apply to primary action),
- n.) 28 USC § 1348 *banking association as party* (Actions by Banks),
- o.) 28 USC § 1355 *district courts have original jurisdiction exclusive of State Courts in any action for the recovery or enforcement of any fine penalty or forfeiture relating to money and incurred under any act of congress*,
- p.) 42 USC § 1985(3) *conspiracy to interfere with civil rights*,

12. The Injunctive Relief will STOP all actions of order and dispose of all orders from the Hamilton County Court of Common Pleas regarding matter A1009020, and specifically to preserve the Jurisdiction of the District Court, and the civil rights of the Plaintiff in this matter by:

- a.) Stopping all foreclosure and equity proceedings of said case,
- b.) Stopping the issue of sale of the said real estate,
- c.) Stopping the sale of the real estate appraisal, and the sale and any actions called upon the Sheriff of Hamilton County regarding the order,
- d.) Stopping any advertisements to sell,
- e.) Stopping any pending payments based upon the order,

13. The Relief will be BOUND to ALL parties, officers, agents, servants, employees, lien holders, and attorneys, regarding Case A1009020 of the Hamilton County Court of Common Pleas.

14. 18 USC § 1965 the District Court has Jurisdiction over all violations of Title 18

15. 18 USC § 1964 the District Court has Jurisdiction to prevent and restrain in regard to § 1962.

16. The District Court has Original Jurisdiction over matters of Diversity

17. Pursuant to 7 USC §25(c), the District Court has Exclusive Jurisdiction for items under Title 7
Commodity Exchanges

18. The District Court has Exclusive Jurisdiction for items under Title 15 USC
19. The District Court has Original Jurisdiction over matters of involving the crime of Securities Fraud.
20. The District Court has Original Jurisdiction over matters to hear cases involving Question of Federal Law and Constitutional Matters.

IV. PARTIES

21. 18 USC § 1964(b) Where the “ends of justice” require other parties residing in any other district be brought before the court. The charges applied to the Defendants equate to Racketeering in Securities and Commodities Fraud. The following lists the Parties and their part in this action. All parties are in place according to Law or Rule or Charter.
22. A1 HUD – fiduciary obligation 24 CFR 203 enforcement
23. A2 MERS – fraudulent transaction and securitizing mortgages
24. A3 First Horizon Home Loans – breach of contract, violations of HUD service agreement
25. A4 FNMA, Fannie Mae – fraudulent representation, violations of HUD service agreement
26. A5 JP Morgan Chase – fraudulent representation, violations of HUD service agreement
27. A6 IBM/LBPS / Seterus – fraudulent representation, violations of HUD service agreement
28. A6 LSR – unlawful tortious interference, wrongful action
29. A7 The Office of the Comptroller of the Currency – fiduciary obligation, failure to protect, failure to make securitized mortgages affordable
30. A7 Office of Thrift Supervision – fiduciary obligation, failure to protect, failure to make securitized mortgages affordable

31. A7 Board of Governors of the Federal Reserve System – fiduciary obligation, failure to protect, failure to make securitized mortgages affordable
32. A7 Federal Deposit Insurance Corporation – fiduciary obligation, failure to protect, failure to make securitized mortgages affordable
33. A7 Consumer Finance Protection Bureau – fiduciary obligation, failure to protect, failure to make securitized mortgages affordable
34. A7 National Credit Union Administration – fiduciary obligation, failure to protect, failure to make securitized mortgages affordable
35. B1 Save the Dream – Withholding emergency funding, document collections, working in conjunction with the Ohio Attorney General
36. B2 OHIO – settling lawsuits ex-parte, withholding currency belonging to ex-parte parties
37. B3 SEC – settling lawsuits ex-parte, withholding currency belonging to ex-parte parties
38. C1 Commodity Futures Trading Commission – Enforcement and Protection against Securities and Commodities fraud. This agency tried to warn the Regulators as well as the United States.
39. C2 US Dept of the Treasury – Alan Greenspan / Tim Geithner – This department under Alan Greenspan is directly responsible for the causation of the housing market crises.
40. C3 United States – The Government Agency depended upon the advice of the Banks and the ^{U.S. #} ~~Treasury~~ and is added only because it must be named as party
41. D1 SIPC Securities Investor Protection Corporation – This agency insures investors and settles lawsuits ex-parte, withholding currency belonging to ex-parte parties
42. D2 North American Securities Administration Association – This agency insures investors and settles lawsuits ex-parte, withholding currency belonging to ex-parte parties

43. F1 Unknown Parties – To be announced by the Court or as permitted by law or rule at the onset of the complaint, or after learning more information in trial.

V. FACTS AND CLAIM

44. Plaintiff Haller was in agreement with First Horizon Home Loans (“FHHL”) to begin payments on July 01, 2008 by agreement made on March 21st, 2008.

45. When payment came due, the note and mortgage became securitized, and FHHL sold the Servicing to JP Morgan Chase & Co (Chase).

46. Haller fell into unemployment July 5th, 2008 for four months, had approximately two months of work at the end of 2008.

47. Once the transfer occurred, Haller became a Defendant in Hamilton County Court of Common Pleas in case A0806840 filed 7/18/2008 by Lerner Sampson and Rothfuss (“LSR”) claiming to represent FHHL. Pre-Trial conferences were held where Plaintiff maintained a steadfast account of a breach caused by the first Mortgage provider FHHL and LSR retracted the complaint.

48. Haller received a forbearance program with Chase bank that ended in March 2009 and Haller was to contact Chase if employment status remained negative.

49. Haller left several messages for over two months without a return call from Chase.

50. Haller applied for financial assistance March 12th, 2009 provided by the Emergency Homeowners Relief Act (“EHLA”) of the Emergency Housing Act of 1975 (as amended 12 USC § 2701) working through HUD and the State of Ohio via a non-profit organization called the HIT Foundation, in this preliminary crises stage prior to “Save the Dream Ohio.” HIT (*Home is the Foundation*) is/was located in Eaton Ohio.

51. Haller did not receive any financial assistance from the Emergency Funds.

52. Haller contacted Legal Aid for assistance where attorney Elizabeth Tull on 4/18/09 mentions a yield spread premium for selling the home with a higher interest rate which indicates “predatory lending” and to NOT agree to anything the servicer offers that is NOT affordable, where you know you will not be able to sustain payments long term.

53. Communications remained unproductive between Chase and Haller despite Haller’s repeated attempts.

54. Haller gained employment in November 2009.

55. Haller applied for mortgage financial assistance provided by the Emergency Homeowners Relief Act (“EHLP”) of the Emergency Housing Act of 1975, as amended by 12 USC § 2701 working through HUD and the State of Ohio via Save the Dream Ohio, where Chase supposedly came to Music Hall in Cincinnati Ohio to “assist” homeowners, though the agents did not have Chase credentials.

56. Four agents had computers to adjust mortgages on the spot, four agents did not (8 total agents).

57. Haller did not get an agent with a laptop, and volunteered to wait until one was available. The agent advised that they have computers at the office and when she gets back, she will call me to follow-up. Her name was “Champaign” and she provided a generic card.

58. On December 18, 2009 “Champaign” from the Cincinnati Home Ownership Preservation Office (“HOC”) left a message for Haller to call 866-326-0086. HOC and Chase both claimed to have “lost” Haller’s paperwork.

59. It appears as though ANY initiative to “assist” homeowners are actually trying to collect the lost paperwork caused by securitizing the loans, and that they are NOT there to actually provide funding from EHLP.

60. Chase returned to negotiations and offered a modification of the same monthly cost, an amount that was purposely unaffordable just prior to another servicing transfer.

61. Chase then transferred the servicing to IBM/LBPS (*Lender Business Process Services*), now called Seterus (heretoforeward “Seterus”)

62. Haller was in negotiations with Seterus, when LSR wrongfully interfered in the matter as a debt collector claiming to represent Chase.

63. LSR filed complaint A1009020 on 10/4/2010 without Standing and without Subject Matter to invoke the Jurisdiction of the court as well as filed the complaint of Diversity in the wrong Jurisdiction.

64. By submitted sworn affidavit of Haller, Erin Bjerkaas of LSR stated that LSR apparently watches for electronic transfers, then files a foreclosure complaint on that transfer without retainer.

65. Pre-Trial conferences were held where Haller maintained a steadfast account of a breach caused by the first Mortgage provider FHHL and offered Laws of State, of District, and Federal Law including Federal Rules of Civil Procedure informing the court that the case CANNOT be legally heard.

66. Haller's efforts were ignored and Haller filed a complaint with the Ohio General's Office where an agent of that office called Haller back and offered to assist by referring Haller to the Save the Dream Ohio / Restoring Stability website where an application can be filed. The complaint number is 565130.

67. When Haller informed this agent that he has already applied to this Emergency Fund but received NO assistance, the agent informed Haller that she did not see any applications he filed.

68. ON March 24, 2011 Haller informed all parties of interest of the complaint filed with the Ohio Attorney General's office and further advised that FNMA or Fannie Mae on this date at 9:33 AM advised that they have not, nor will they ever pursue a law suit against a property. FNMA further advised that this was the job of the Servicer and advised Haller to contact Chase.

69. Chase stated that a foreclosure process was discontinued on August 26, 2010, yet the case was still in the Hamilton County of Common Pleas, filed two months after the supposed withdrawal.

70. Haller filed another Save the Dream Ohio / Restoring Stability application and made appointments with HOC and the application was closed with false notations on the application.

71. Haller sent an email to Jen Valentine who made the notations asking why she falsified the documents and Haller received NO response.

72. Haller went through the Pre-Trial processes, hoping the court would see the reality of the situation and offered common sense points of fraud on face value of the complaint. Haller was further ignored and the court finally incorrectly agreed to an illegal summary judgment against Haller despite the fact that the court does not have Jurisdiction in the matter.
73. Haller is now seeking action and an injunction in District Court.
74. The Ohio Attorney General's office claims that the reason why the loans are not made affordable is because of the federal banks.
75. Seterus claims that the reason why the loans are not made affordable is because of regulations and law. When asked if he meant Fannie Mae and Freddie Mac, he replied that their hands are tied because of regulations from the federal banks.
76. Haller has had to constantly defend his property and intentions while those who file action do little or nothing to prove their position. The Court of Common Pleas appears to do this for them automatically.
77. Haller's Amended motion was dismissed on the grounds that Haller did not ask for Leave of the court, while Haller is Pro-se and not an attorney.
78. LSR has had the luxury of having several attorneys before the court who were not of record in violation of Local Rule.
79. The Court in A1009020 has commonly asked the opposing party to write up a decree of the court when it is the Court who is to make a decision of its own accord.
80. Haller has a right to his property.
81. Haller has a right to freely negotiate contracts without interference.
82. Haller has a right to Emergency Funds enacted by Congress.
83. Haller has a right to due process and equal protection as afforded by law, against all crimes as described within the facts.

84. Haller has a right as any other citizen, including banks, including investors, to the protections from the Agencies and Regulators who are in office to protect the citizens of the United States.

85. ALL SERVICE PROVIDERS are in Violation of Sections under 24 CFR 203 *servicing responsibilities* Housing and Urban Development.

VI. FURTHER CHARGES AND ALLEGATIONS

86. Along with the Laws, Rules and Codified Regulations, the following also applies:

87. Regulators are not willing to make housing mortgages that fall under this class affordable. This applies to Plaintiff's primary complaint. (SEE EXHIBIT B)^{7th}

88. Though State and Federal Authorities file charges against those who have been a part of this scheme of fraud, they allow the Defendants to settle by "not admitting nor denying" the charges. This applies to Plaintiff's primary complaint.

89. Millions of dollars are going to State and Federal Agencies and victims are not a part of the settlement. This applies to Plaintiff's primary complaint.

90. Profit continues to be made by the banks, and other private entities. This applies to Plaintiff's primary complaint.

91. People who have not been heard in this matter, such as homeless victims, remain homeless or have not been made whole as a result of this scheme of fraud. This does not apply to Plaintiff's primary complaint.

92. Robo-signers companies and fraudulent documentation companies remain in business. This applies to Plaintiff's primary complaint.

93. The Justice Department is aware of the issues yet while there may be logical reason, it allows the fraud to continue. This applies to Plaintiff's primary complaint as the case A1009020 and all cases of securitized foreclosures have not yet been halted.

94. The United States is held hostage by scheme of fraud. Plaintiff is a citizen of the United States.

95. Plaintiff is not aware of or have been involved in specific levies 26 USC § 7426 *wrongful levy*.
96. Plaintiff brings action against Defendants for contributing to any Creditor's cause of actions, in relation to (but not limiting) the following:
- A) Intentional Fraudulent Conveyance or Transfer by Creditors of Real Property
 - B) Wrongful Trading
 - C) Settlements made ex-parte
 - D) Securities and Commodities Fraud
 - E) Tortious interference of contracts
 - F) Civil Violations
97. The losses to financial institutions directly attributable to mortgage fraud in 2008 were \$15 to \$25 billion, according to industry estimates. Prosecutors consider mortgage fraud to be "among the most economically destructive crimes prosecuted by their offices," according to the New York Times: while "bank robbers average less than \$2,000 and face a 75 percent chance of being caught, a mortgage fraud ring walks away with hundreds of thousands of dollars per house, prosecutors say, and runs little risk of arrest."⁹³
98. When trying to acquire funds provided to homeowners, funding does not materialize.
99. Foreclosures continue because there is more profit in foreclosing (more profit than the property is even worth).
100. Settlements continue with the SEC and with State Attorney Generals because there is money to be made but all the victims are not heard or made whole.
101. The Ohio Attorney General's office has admitted that they are waiting on legislation and that the problem is with the Federal Banks.

³ Report from Bureau of Justice Assistance, US Department of Justice called "A Full Response to an Empty House: Public Safety Strategies for Addressing Mortgage Fraud and the Foreclosure Crises" By Author Robert V. Wolf Director of Communications Center for Court Innovation: http://www.ojp.usdoj.gov/BJA/pdf/CCI_Foreclosure_Crisis.pdf

102. The Service Provider Seterus (aka IBM/LBPS) also advises that their hands are tied because of rules provided by the Federal Banks.
103. Our nation cannot be held captive by the banking system regardless of the Government's dependency upon the banks, and the victims have a constitutional right for redress on this scheme of profit. Banks are practicing business within the boundaries and laws of United States.

VII. REMEDIES

104. Grant Immediate Injunctive Relief and schedule the action for Jury Trial.
105. Provide Panel Review to determine class, nation-wide actions, and Jurisdiction.
106. 18 USC § 1965(b) Where the "ends of justice" require other parties residing in any other district be brought before the court, Plaintiff requests the court to consider further defendants to this action including Freddie Mac, Other Banks and Regulators, and Stock Market Exchanges, and any other business who are known to participated in securitized commercial and residential mortgages.
107. By Judicial Discretion and Pursuant to 15 USC § 26 and 18 USC § 3102 Plaintiff herby moves the District Court of Southwestern Ohio to impose a nation-wide injunction against Stock Markets in the transfer or trade of, against the SEC and ALL State Attorney Generals bringing action in regard to, against the Banks and Regulatory system and all creditors of ALL Commercial and Residential properties that meet the criteria of ILLEGAL SECURITIZED MORTGAGES, to cease any and all transfers, to cease all foreclosures, to stop all liquidations involving and settlements, and to freeze all monies that have been involved, past and present (where possible) to include all settlements made ex-parte, where not all parties were present to the action, and to freeze all company records, involved in the fraudulent scheme of transfer of all Real Commercial and Residential property that have been securitized, until facts can be revealed, and all parties can be heard, and resolutions can be proffered to correct and stabilize what has occurred in the mortgage securitizing market, as well as to make available the correct venue for all to be heard and consider 7 USC § 13.

108. Publicize warnings so that individuals and businesses are aware of the crimes to refrain from, even though knowledge (or lack of) is not a viable defense.

VIII. AFFIDAVID OF MERIT AND EXPERT WITNESSES

109. Plaintiff hereby re-alleges paragraphs 1-76 above are true. As expert witnesses and witnesses of fact are called in testimony or dissertation and further evidence is revealed, Plaintiff reserves the right to present additional Expert Witnesses and Witnesses of Fact and add Defendants as permitted with what is learned.

IX. CONCLUSION AND JURY DEMAND

110. The District Court has Original Jurisdiction over this matters and has Exclusive Jurisdiction in areas under this matter.
111. As the Hamilton County Court of Common Please does not have Jurisdiction to render a verdict other than dismissal, GRANT Immediate Injunctive Relief and schedule the action for Jury Trial.
112. Provide Panel Review to determine class, nation-wide actions, and Jurisdiction.
113. Place the action on Schedule.
114. Pursuant to 18 USC § 3691 and FRCP 38 (A)(B), Plaintiff demands a trial by jury on all issues so triable.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Daniel R. Haller", written in black ink. The signature is fluid and stylized, with a long horizontal line extending from the end of the name.

Daniel R. Haller, Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Civil Complaint and Jury Demand have been sent to the following parties via Certified mail on this 12TH day of December, 2011.

(41) HUD/FHA

U.S. Department of Housing and Urban Development
Office of the Inspector General
Deputy Inspector General Michael P. Stephens
451 7th Street S.W.
Washington, DC 20410

(42) MERSCORP, Inc.

President and CEO Bill Beckmann
1818 Library Street, Suite 300
Reston, VA 20190

(43) First Horizon Home Loans

President and CEO D. Bryan Jordan
aka: First Horizon National Corporation
aka: First Tennessee National Corp
165 Madison Avenue
Memphis, TN 38103

(44) Federal National Mortgage Association

Fannie Mae (or FNMA)
President and CEO Michael J. Williams
3900 Wisconsin Avenue, NW
Washington, DC 20016-2892

(45) JP Morgan Chase & Co

President James S. Crown and CEO Jamie Dimon
Chase Home Finance LLC
270 Park Avenue, New York, NY 10017

(46) IBM/LBPS – SETERUS (3 people, 3 addresses, 9 subpoenas)

1. President and CEO Afzal Assur
 2. Acting President and Director Jay Memmott (OR)
 3. cc: Vice President Karen B Pollock (NC)
- 8501 IBM Drive, 201-2DD188
Charlotte, NC 28262-4333
14523 SW Millikan Way Suite 200
Beaverton, OR 97005

3039 Cornwallis Road, bldg 203, CC133
Research Triangle PA, NC 27709

(46) Lerner Sampson and Rothfuss

President and CEO Richard M Rothfuss

120 East 4th Street, Suite 800
Cincinnati, Ohio 45202

(A7) The Office of the Comptroller of Currency

Chief Executive John G. Walsh
Independence Square
250 E Street, SW
Washington, DC 20219

(A7) Office of Thrift Supervision

Director John E. Bowman

(A7) Board of Governors of the Federal Reserve System

Chairman Ben S. Bernanke
20th Street and Constitution Avenue N.W.
Washington, D.C. 20551

(A7) Federal Deposit Insurance Corporation

Chairman Martin J Gruenberg MB-6000
Director Thomas J Curry MB-6098
cc/ Division of Depositor and Consumer Protection
Director Mark Pearce Room F-6074
550 17th Street Northwest
Washington, DC 20429

(A7) Consumer Financial Protection Bureau

Director Richard Cordray
1500 Pennsylvania Ave. NW
Washington, DC 20220

(A7) National Credit Union Administration

Inspector General William DeSarno
1775 Duke St.
Alexandria, VA 22314-3428

(B1) OHFA Ohio Housing Finance Agency

Executive Director Douglas A. Garver
57 East Main Street
Columbus, Ohio 43215

(B2) State of Ohio

Attorney General Mike DeWine
The Office of Ohio Attorney General
30 E. Broad Street, 17th Floor
Columbus, Ohio 43215

(B3) SEC Securities and Exchange Commission

Chairman Mary L. Schapiro
100 F Street, NE
Washington, DC 20549

(CI) Commodity Futures Trading Commission

Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

(CI) Commodity Futures Trading Commission

Chairman Gary Gensler
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

(C2) US DEPT OF THE TREASURY

Secretary of the Treasury Timothy Geithner
1500 Pennsylvania Ave
Washington, DC 20220

(C3) United States

Attorney General Eric H. Holder Jr
Federal Office of The Attorney General
Dept of Justice, Room 4400
950 Pennsylvania Ave NW
Washington, DC 20530

(DI) Securities Investor Protection Corporation

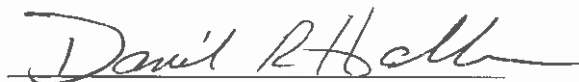
President and CEO Stephen P. Harbeck
805 15th Street, N.W. Suite 800
Washington, D.C. 20005-2215

(D2) North American Securities Administration Association

President Jack Herstein and Director Steven Irwin
750 First Street NE, Suite 1140
Washington, DC 20002

(FI) Unknown Defendants

Other Banks, Stock Markets, and Other Unknowns



Daniel R. Haller, Plaintiff
4221 Sullivan Ave
Cincinnati, Ohio 45217
dnlhaller@yahoo.com
513-582-2727

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Complaint was served according to FRCP4 with praecipe upon the parties as listed via Certified US Mail on this 16th day of December, 2011.

A handwritten signature in black ink, reading "Daniel R. Haller", written over a horizontal line.

Daniel R. Haller, Plaintiff